

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

*The Muscogee (Creek) Nation v. Purdue
Pharma L.P., et al.*
Case No. 1:18-op-45459-DAP

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**DEFENDANT WALMART INC.'S ANSWER AND
AFFIRMATIVE DEFENSES TO PLAINTIFF'S FIRST
AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL**

Defendant Walmart Inc. ("Walmart") hereby answers the First Amended Complaint (Case No. 17-md-2804 (N.D. Ohio) ("MDL"), ECF No. 731; Case No. 1:18-op-45459 (N.D. Ohio), ECF No. 19) ("Complaint") filed in *The Muscogee (Creek) Nation v. Purdue Pharma L.P., et al.*

Unless expressly stated otherwise, Walmart denies each and every allegation in the Complaint, including any allegations in the preamble, unnumbered and numbered paragraphs, titles, headings, subheadings, table of contents, footnotes, exhibits, characterization of documents, and stricken paragraphs, and specifically denies any liability to Plaintiff. To the extent not expressly denied, all allegations for which Walmart denies possessing knowledge or information sufficient to form a belief are denied. Walmart reserves the right to seek to amend and supplement its Answer as may be appropriate or necessary.

INTRODUCTION

1. Walmart admits prescription opioids are a class of legal substances that include medications such as pain relievers. Walmart also admits that prescription opioids, when prescribed and taken properly, can be used to relieve moderate to severe pain following surgery or injury or

for certain chronic health conditions. Further, while Walmart acknowledges that there are individuals who have misused, abused, and suffer from addiction to prescription opioids, Walmart is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1; such allegations are therefore deemed to be denied.

2. Paragraph 2 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Walmart acknowledges that abuse and addiction to opioids is a serious public health issue, but is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 2; such allegations are therefore deemed to be denied.

3. Paragraph 3 states argument, to which no response is required. To the extent a response is required, Walmart denies the allegations in Paragraph 3 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

4. The allegations in Paragraph 4 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 4 is deemed to contain allegations against Walmart, Walmart denies such allegations.

5. Paragraph 5 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 5 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations

are therefore deemed to be denied. Moreover, to the extent Paragraph 5 is deemed to contain allegations against Walmart, Walmart denies such allegations.

6. Paragraph 6 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6; such allegations are therefore deemed to be denied.

7. Paragraph 7 refers to documents that speaks for themselves, and Walmart denies any characterizations thereof. Further, Walmart acknowledges that abuse and addiction to opioids is a serious public health issue, but Walmart is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 7; such allegations are therefore deemed to be denied.

8. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8; such allegations are therefore deemed to be denied.

9. Walmart admits that manufacturers, distributors, pharmacies, and consumers are among those that may play a role in the supply chain for prescription opioids. But Walmart denies that it distributed prescription opioids to anyone other than stores operated by Walmart and/or its subsidiaries for dispensing to customers with valid prescriptions. Further, Walmart denies the remaining allegations in Paragraph 9 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

10. The allegations in Paragraph 10 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 10 is deemed to contain allegations against Walmart, Walmart denies such allegations.

11. Paragraph 11 states argument and legal conclusions to which no response is required. To the extent a response is required, Walmart denies those arguments and legal conclusions. Further, Walmart admits that 21 CFR 1301.74(b) defines suspicious orders as including orders of “[u]nusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency.” Walmart denies the remaining allegations in Paragraph 11 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

12. Walmart denies the allegations in Paragraph 12 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

13. Paragraph 13 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13; such allegations are therefore deemed to be denied.

14. Paragraph 14 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 14 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 14, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

15. Paragraph 15 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Walmart denies the allegations in Paragraph 15 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

16. Paragraph 16 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16; such allegations are therefore deemed to be denied.

17. Paragraph 17 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17; such allegations are therefore deemed to be denied.

18. Paragraph 18 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 18; such allegations are therefore deemed to be denied.

19. Paragraph 19 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19; such allegations are therefore deemed to be denied.

20. Walmart denies the allegations in the first sentence of Paragraph 20 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 20, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

21. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21; such allegations are therefore deemed to be denied.

22. Paragraph 22 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 22 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

23. Paragraph 23, which summarizes Plaintiff's claims, does not require a response. To the extent a response is required, Walmart denies that Plaintiff is entitled to relief on the claims asserted against Walmart and further denies the remaining allegations in Paragraph 23 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

24. Paragraph 24, which summarizes Plaintiff's claims, does not require a response. To the extent a response is required, Walmart denies that Plaintiff is entitled to relief on the claims asserted against Walmart and further denies the remaining allegations in Paragraph 24 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form

a belief as to the truth of the allegations in Paragraph 24, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

PARTIES

25. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25; such allegations are therefore deemed to be denied.

26. Paragraph 26 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26; such allegations are therefore deemed to be denied.

27. Paragraph 27, which summarizes Plaintiff's claims, does not require a response. To the extent a response is required, Walmart denies that Plaintiff is entitled to relief on the claims asserted against Walmart and further denies the remaining allegations in Paragraph 27 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

28. The allegations in Paragraph 28 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 28 is deemed to contain allegations against Walmart, Walmart denies such allegations.

29. The allegations in Paragraph 29 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 29 is deemed to contain allegations against Walmart, Walmart denies such allegations.

30. The allegations in Paragraph 30 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 30 is deemed to contain allegations against Walmart, Walmart denies such allegations.

31. The allegations in Paragraph 31 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 31 is deemed to contain allegations against Walmart, Walmart denies such allegations.

32. The allegations in Paragraph 32 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 32 is deemed to contain allegations against Walmart, Walmart denies such allegations.

33. The allegations in Paragraph 33 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 33 is deemed to contain allegations against Walmart, Walmart denies such allegations.

34. The allegations in Paragraph 34 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 34 is deemed to contain allegations against Walmart, Walmart denies such allegations.

35. The allegations in Paragraph 35 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 35 is deemed to contain allegations against Walmart, Walmart denies such allegations.

36. The allegations in Paragraph 36 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 36 is deemed to contain allegations against Walmart, Walmart denies such allegations.

37. The allegations in Paragraph 37 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 37 is deemed to contain allegations against Walmart, Walmart denies such allegations.

38. The allegations in Paragraph 38 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 38 is deemed to contain allegations against Walmart, Walmart denies such allegations.

39. The allegations in Paragraph 39 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 39 is deemed to contain allegations against Walmart, Walmart denies such allegations.

40. The allegations in Paragraph 40 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 40 is deemed to contain allegations against Walmart, Walmart denies such allegations.

41. The allegations in Paragraph 41 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 41 is deemed to contain allegations against Walmart, Walmart denies such allegations.

42. The allegations in Paragraph 42 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 42 is deemed to contain allegations against Walmart, Walmart denies such allegations.

43. The allegations in Paragraph 43 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 43 is deemed to contain allegations against Walmart, Walmart denies such allegations.

44. The allegations in Paragraph 44 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 44 is deemed to contain allegations against Walmart, Walmart denies such allegations.

45. The allegations in Paragraph 45 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 45 is deemed to contain allegations against Walmart, Walmart denies such allegations.

46. The allegations in Paragraph 46 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 46 is deemed to contain allegations against Walmart, Walmart denies such allegations.

47. The allegations in Paragraph 47 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 47 is deemed to contain allegations against Walmart, Walmart denies such allegations.

48. The allegations in Paragraph 48 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 48 is deemed to contain allegations against Walmart, Walmart denies such allegations.

49. The allegations in Paragraph 49 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 49 is deemed to contain allegations against Walmart, Walmart denies such allegations.

50. The allegations in Paragraph 50 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 50 is deemed to contain allegations against Walmart, Walmart denies such allegations.

51. The allegations in Paragraph 51 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 51 is deemed to contain allegations against Walmart, Walmart denies such allegations.

52. Walmart admits that it is a Delaware corporation with its principal place of business in Arkansas. Walmart also admits that for a time period prior to April 2018, Walmart, through its subsidiary, distributed certain prescription medication to its own stores in Oklahoma. Walmart denies the remaining allegations in Paragraph 52.

53. The allegations in Paragraph 53 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 53 is deemed to contain allegations against Walmart, Walmart denies such allegations.

54. The allegations in Paragraph 54 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 54 is deemed to contain allegations against Walmart, Walmart denies such allegations.

55. The allegations in Paragraph 55 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 55 is deemed to contain allegations against Walmart, Walmart denies such allegations.

56. The allegations in Paragraph 56 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 56 is deemed to contain allegations against Walmart, Walmart denies such allegations.

57. The allegations in Paragraph 57 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 57 is deemed to contain allegations against Walmart, Walmart denies such allegations.

58. The allegations in Paragraph 58 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 58 is deemed to contain allegations against Walmart, Walmart denies such allegations.

59. The allegations in Paragraph 59 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 59 is deemed to contain allegations against Walmart, Walmart denies such allegations.

60. The allegations in Paragraph 60 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 60 is deemed to contain allegations against Walmart, Walmart denies such allegations.

61. The allegations in Paragraph 61 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 61 is deemed to contain allegations against Walmart, Walmart denies such allegations.

62. Walmart admits it has, on certain occasions, entered into agreements to resolve government allegations relating to pharmacy operations. Walmart denies the remaining allegations in Paragraph 62 to the extent they apply to Walmart. Further, while Walmart is aware of reports regarding the payment of civil penalties by other defendants, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

63. The allegations in Paragraph 63 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 63 is deemed to contain allegations against Walmart, Walmart denies such allegations.

64. The allegations in Paragraph 64 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 64 is deemed to contain allegations against Walmart, Walmart denies such allegations.

65. The allegations in Paragraph 65 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 65 is deemed to contain allegations against Walmart, Walmart denies such allegations.

66. The allegations in Paragraph 66 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 66 is deemed to contain allegations against Walmart, Walmart denies such allegations.

67. The allegations in Paragraph 67 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 67 is deemed to contain allegations against Walmart, Walmart denies such allegations.

68. Walmart admits that it is a Delaware corporation with its principal place of business in Arkansas. Walmart also admits that it dispensed certain prescription medication to customers with valid prescriptions at certain of its own stores in Oklahoma. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68; such allegations are therefore deemed to be denied.

69. The allegations in Paragraph 69 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 69 is deemed to contain allegations against Walmart, Walmart denies such allegations.

70. The allegations in Paragraph 70 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 70 is deemed to contain allegations against Walmart, Walmart denies such allegations.

71. The allegations in Paragraph 71 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 71 is deemed to contain allegations against Walmart, Walmart denies such allegations.

72. The allegations in Paragraph 72 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 72 is deemed to contain allegations against Walmart, Walmart denies such allegations.

73. The allegations in Paragraph 73 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 73 is deemed to contain allegations against Walmart, Walmart denies such allegations.

74. The allegations in Paragraph 74 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 74 is deemed to contain allegations against Walmart, Walmart denies such allegations.

75. The allegations in Paragraph 75 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 75 is deemed to contain allegations against Walmart, Walmart denies such allegations.

76. The allegations in Paragraph 76 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 76 is deemed to contain allegations against Walmart, Walmart denies such allegations.

77. The allegations in Paragraph 77 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 77 is deemed to contain allegations against Walmart, Walmart denies such allegations.

78. The allegations in Paragraph 78 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 78 is deemed to contain allegations against Walmart, Walmart denies such allegations.

79. The allegations in Paragraph 79 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 79 is deemed to contain allegations against Walmart, Walmart denies such allegations.

80. The allegations in Paragraph 80 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 80 is deemed to contain allegations against Walmart, Walmart denies such allegations.

81. The allegations in Paragraph 81 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 81 is deemed to contain allegations against Walmart, Walmart denies such allegations.

82. The allegations in Paragraph 82 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 82 is deemed to contain allegations against Walmart, Walmart denies such allegations.

83. The allegations in Paragraph 83 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 83 is deemed to contain allegations against Walmart, Walmart denies such allegations.

84. The allegations in Paragraph 84 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 84 is deemed to contain allegations against Walmart, Walmart denies such allegations.

85. The allegations in Paragraph 85 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 85 is deemed to contain allegations against Walmart, Walmart denies such allegations.

86. The allegations in Paragraph 86 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 86 is deemed to contain allegations against Walmart, Walmart denies such allegations.

87. The allegations in Paragraph 87 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 87 is deemed to contain allegations against Walmart, Walmart denies such allegations.

88. The allegations in Paragraph 88 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 88 is deemed to contain allegations against Walmart, Walmart denies such allegations.

89. The allegations in Paragraph 89 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 89 is deemed to contain allegations against Walmart, Walmart denies such allegations.

90. The allegations in Paragraph 90 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 90 is deemed to contain allegations against Walmart, Walmart denies such allegations.

91. The allegations in Paragraph 91 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 91 is deemed to contain allegations against Walmart, Walmart denies such allegations.

92. Paragraph 92 states a legal conclusion to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 92. Further, Walmart admits it has, on certain occasions, entered into agreements to resolve government allegations relating to pharmacy operations. Walmart denies the remaining allegations in Paragraph 92 to the extent they apply to Walmart. Moreover, while Walmart is aware of reports regarding the payment of civil penalties by other defendants, Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

JURISDICTION AND VENUE

93. Paragraph 93 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 93 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

94. Paragraph 94 states a legal conclusion to which no response is required. To the extent a response is required, Walmart admits that for a time period prior to April 2018, Walmart, through its subsidiary, distributed certain prescription medication to certain of its own stores in Oklahoma. Walmart further admits that it dispensed certain prescription medication to customers with valid prescriptions at certain of its own stores in Oklahoma. Walmart also admits it is not aware of a reason or basis to dispute the personal jurisdiction of this Court over Walmart for the claims asserted in the Complaint. Walmart denies the remaining allegations in Paragraph 94 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 94, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

95. Paragraph 95 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 95 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

FACTUAL BACKGROUND

96. Paragraph 96 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart admits that prescription opioids are a class of legal substances that include medications such as pain relievers. Walmart also admits that prescription opioids, when prescribed and taken properly, can be used to relieve moderate to severe pain following surgery or injury or for certain chronic health conditions. Further, while Walmart acknowledges that there are individuals who have misused, abused, and suffer from addiction to prescription opioids, Walmart is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 96; such allegations are therefore deemed to be denied.

97. Paragraph 97 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 97. Further, Paragraph 97 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 97 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

98. Paragraph 98 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 98 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

99. Paragraph 99 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 99. Further, the allegations in Paragraph 99 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 99 is deemed to contain allegations against Walmart, Walmart denies such allegations.

100. Paragraph 100 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 100 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

101. Paragraph 101 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 101. Further, the allegations contained in Paragraph 101 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 101; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 101 is deemed to contain allegations against Walmart, Walmart denies such allegations.

102. The allegations in Paragraph 102 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 102 is deemed to contain allegations against Walmart, Walmart denies such allegations.

103. The allegations in Paragraph 103 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 103 is deemed to contain allegations against Walmart, Walmart denies such allegations.

104. Paragraph 104 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 104 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 104 is deemed to contain allegations against Walmart, Walmart denies such allegations.

105. Paragraph 105 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 105 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 105 is deemed to contain allegations against Walmart, Walmart denies such allegations.

106. Paragraph 106 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 106 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 106 is deemed to contain allegations against Walmart, Walmart denies such allegations.

107. Paragraph 107 refers to a document that speak for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 107 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 107 is deemed to contain allegations against Walmart, Walmart denies such allegations.

108. Paragraph 108 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 108 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 108 is deemed to contain allegations against Walmart, Walmart denies such allegations.

109. Paragraph 109 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 109 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such

allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 109 is deemed to contain allegations against Walmart, Walmart denies such allegations.

110. Paragraph 110 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 110 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 110 is deemed to contain allegations against Walmart, Walmart denies such allegations.

111. Paragraph 111 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 111 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 111 is deemed to contain allegations against Walmart, Walmart denies such allegations.

112. Paragraph 112 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 112 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 112 is deemed to contain allegations against Walmart, Walmart denies such allegations.

113. Paragraph 113 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 113 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response,

Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 113 is deemed to contain allegations against Walmart, Walmart denies such allegations.

114. Paragraph 114 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 114 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 114 is deemed to contain allegations against Walmart, Walmart denies such allegations.

115. Paragraph 115 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 115 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 115 is deemed to contain allegations against Walmart, Walmart denies such allegations.

116. The allegations in Paragraph 116 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 116 is deemed to contain allegations against Walmart, Walmart denies such allegations.

117. Paragraph 117 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 117 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response,

Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 117 is deemed to contain allegations against Walmart, Walmart denies such allegations.

118. Paragraph 118 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 118 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 118 is deemed to contain allegations against Walmart, Walmart denies such allegations.

119. Paragraph 119 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119; such allegations are therefore deemed to be denied.

120. The allegations in Paragraph 120 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 120 is deemed to contain allegations against Walmart, Walmart denies such allegations.

121. Paragraph 121 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 121 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such

allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 121 is deemed to contain allegations against Walmart, Walmart denies such allegations.

122. Paragraph 122 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 122 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 122 is deemed to contain allegations against Walmart, Walmart denies such allegations.

123. Paragraph 123 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 123 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 123 is deemed to contain allegations against Walmart, Walmart denies such allegations.

124. Paragraph 124 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 124 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 124 is deemed to contain allegations against Walmart, Walmart denies such allegations.

125. The allegations in Paragraph 125 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 125 is deemed to contain allegations against Walmart, Walmart denies such allegations.

126. The allegations in Paragraph 126 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 126 is deemed to contain allegations against Walmart, Walmart denies such allegations.

127. The allegations in Paragraph 127 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 127 is deemed to contain allegations against Walmart, Walmart denies such allegations.

128. Paragraph 128 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 128 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 128 is deemed to contain allegations against Walmart, Walmart denies such allegations.

129. Paragraph 129 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 129 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such

allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 129 is deemed to contain allegations against Walmart, Walmart denies such allegations.

130. The allegations in Paragraph 130 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 130 is deemed to contain allegations against Walmart, Walmart denies such allegations.

131. Paragraph 131 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 131 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 131 is deemed to contain allegations against Walmart, Walmart denies such allegations.

132. Paragraph 132 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 132 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 132 is deemed to contain allegations against Walmart, Walmart denies such allegations.

133. Paragraph 133 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 133 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such

allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 133 is deemed to contain allegations against Walmart, Walmart denies such allegations.

134. Paragraph 134 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 134 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 134 is deemed to contain allegations against Walmart, Walmart denies such allegations.

135. The allegations in Paragraph 135 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 135 is deemed to contain allegations against Walmart, Walmart denies such allegations.

136. Paragraph 136 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 136 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 136 is deemed to contain allegations against Walmart, Walmart denies such allegations.

137. Paragraph 137 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 137 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such

allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 137 is deemed to contain allegations against Walmart, Walmart denies such allegations.

138. The allegations in Paragraph 138 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 138 is deemed to contain allegations against Walmart, Walmart denies such allegations.

139. Paragraph 139 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 139 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 139 is deemed to contain allegations against Walmart, Walmart denies such allegations.

140. Paragraph 140 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 140 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 140 is deemed to contain allegations against Walmart, Walmart denies such allegations.

141. Paragraph 141 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 141 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such

allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 141 is deemed to contain allegations against Walmart, Walmart denies such allegations.

142. Paragraph 142 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 142 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 142 is deemed to contain allegations against Walmart, Walmart denies such allegations.

143. Paragraph 143 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 143 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 143 is deemed to contain allegations against Walmart, Walmart denies such allegations.

144. Paragraph 144 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 144 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 144 is deemed to contain allegations against Walmart, Walmart denies such allegations.

145. Paragraph 145 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 145 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response,

Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 145 is deemed to contain allegations against Walmart, Walmart denies such allegations.

146. Paragraph 146 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 146 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 146 is deemed to contain allegations against Walmart, Walmart denies such allegations.

147. Paragraph 147 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 147 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 147 is deemed to contain allegations against Walmart, Walmart denies such allegations.

148. Paragraph 148 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 148 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 148 is deemed to contain allegations against Walmart, Walmart denies such allegations.

149. The allegations in Paragraph 149 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 149 is deemed to contain allegations against Walmart, Walmart denies such allegations.

150. Paragraph 150 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 150. Further, the allegations in Paragraph 150 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 150 is deemed to contain allegations against Walmart, Walmart denies such allegations.

151. The allegations in Paragraph 151 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 151 is deemed to contain allegations against Walmart, Walmart denies such allegations.

152. The allegations in Paragraph 152 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 152 is deemed to contain allegations against Walmart, Walmart denies such allegations.

153. Paragraph 153 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Further, Paragraph 153 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Moreover, the allegations in Paragraph 153 are not

directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. To the extent Paragraph 153 is deemed to contain allegations against Walmart, Walmart denies such allegations.

154. The allegations in Paragraph 154 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 154 is deemed to contain allegations against Walmart, Walmart denies such allegations.

155. The allegations in Paragraph 155 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 155 is deemed to contain allegations against Walmart, Walmart denies such allegations.

156. The allegations in Paragraph 156 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 156 is deemed to contain allegations against Walmart, Walmart denies such allegations.

157. Paragraph 157 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 157. Further, the allegations in Paragraph 157 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 157 is deemed to contain allegations against Walmart, Walmart denies such allegations.

158. Paragraph 158 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 158. Further, Paragraph 158 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Moreover, the allegations in Paragraph 158 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 158 is deemed to contain allegations against Walmart, Walmart denies such allegations.

159. Paragraph 159 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 159. Further, the allegations in Paragraph 159 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 159 is deemed to contain allegations against Walmart, Walmart denies such allegations.

160. The allegations in Paragraph 160 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 160 is deemed to contain allegations against Walmart, Walmart denies such allegations.

161. The allegations in Paragraph 161 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 161 is deemed to contain allegations against Walmart, Walmart denies such allegations.

162. Paragraph 162 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 162. Further, Paragraph 162 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 162 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

163. Paragraph 163 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 163. Further, Paragraph 163 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 163 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

164. Paragraph 164 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 164. Further, Paragraph 164 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 164 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

165. Paragraph 165 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 165 and further denies the remaining allegations contained therein to the extent they apply to Walmart.

Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

166. Paragraph 166 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 166. Further, Paragraph 166 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 166 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

167. Paragraph 167 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 167 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

168. Paragraph 168 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 168 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

169. Walmart admits that the United States Government maintains the ARCOS database, which tracks information relating to controlled substance transactions. Further, Paragraph 169 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 169 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

170. Paragraph 170 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 170

contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

171. Paragraph 171 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 171 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

172. Paragraph 172 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 172 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

173. Paragraph 173 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Paragraph 173 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 173. To the extent Paragraph 173 contains allegations of wrongdoing on the part of Walmart, Walmart denies such allegations.

174. Paragraph 174 purports to recite standards of care that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 174 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

175. Paragraph 175 purports to recite standards of care that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 175 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

176. Paragraph 176 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 176

contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

177. Walmart admits certain prescribers of controlled substances are issued DEA identification numbers and are obligated to sign prescriptions for controlled substances. Further, Paragraph 177 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 177 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

178. Paragraph 178 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 178. Further, Paragraph 178 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 178 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 178, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

179. Paragraph 179 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 179. Further, Paragraph 179 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 179 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

180. Paragraph 180 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 180 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 180, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

181. Paragraph 181 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 181. Further, Paragraph 181 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 181 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

182. Paragraph 182 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 182 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

183. Paragraph 183 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 183 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

184. Paragraph 184 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 184 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

185. Paragraph 185 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 185. Further, Paragraph 185 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 185 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

186. Paragraph 186 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 186. Further, Paragraph 186 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 186 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

187. Paragraph 187 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 187. Further, Paragraph 187 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 187 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

188. Paragraph 188 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 188. Further, Paragraph 188 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 188 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

189. Paragraph 189 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 189 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

190. Paragraph 190 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 190 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

191. Paragraph 191 purports to recite standards of care and law that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 191 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

192. Paragraph 192 refers to documents and purports to recite standards of care that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192; such allegations are therefore deemed to be denied.

193. Paragraph 193 refers to documents and purports to recite standards of care that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193; such allegations are therefore deemed to be denied.

194. Paragraph 194 purports to recite standards of care that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 194 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

195. Paragraph 195 purports to recite standards of care that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 195 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

196. Paragraph 196 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 196. To the extent Paragraph 196 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

197. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197; such allegations are therefore deemed to be denied.

198. Paragraph 198 purports to recite standards of care that speak for themselves, and Walmart denies any characterizations thereof. To the extent Paragraph 198 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

199. Paragraph 199 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 199. Further, Paragraph 199 purports to recite standards of care and law that speaks for themselves, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 199 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

200. Walmart denies the allegations in Paragraph 200 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 200, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

201. Walmart denies the allegations in Paragraph 201 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

202. Walmart admits that the DEA has provided a briefing to Walmart. Walmart denies the remaining allegations in Paragraph 202 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 202, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

203. Paragraph 203 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Walmart admits that the DEA has conducted conferences. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203; such allegations are therefore deemed to be denied.

204. Walmart admits that the DEA has conducted conferences. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204; such allegations are therefore deemed to be denied.

205. Paragraph 205 refers to documents that speaks for themselves, and Walmart denies any characterizations thereof. Further, Walmart denies the allegations in Paragraph 205 to the extent they apply to Walmart, except that Walmart is aware of letters from the DEA dated September 27, 2006, and December 27, 2007. Walmart is without knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 205, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

206. Paragraph 206 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Walmart admits that HDMA created “Industry Compliance Guidelines.” Walmart denies the remaining allegations in Paragraph 206 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 206, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

207. Paragraph 207 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Walmart denies the allegations in Paragraph 207 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 207, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

208. Walmart has expressed its belief that the abuse of and addiction to prescription drugs is a serious public health issue. Walmart has also expressed its commitment to be part of the solution to prescription drug abuse and addiction. Walmart denies the remaining allegations in Paragraph 208 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 208, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

209. Paragraph 209 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 209 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response,

Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 209 is deemed to contain allegations against Walmart, Walmart denies such allegations.

210. Paragraph 210 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 210 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 210 is deemed to contain allegations against Walmart, Walmart denies such allegations.

211. Paragraph 211 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 211 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 211, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

212. Paragraph 212 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 212 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

213. The allegations in Paragraph 213 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 213 is deemed to contain allegations against Walmart, Walmart denies such allegations.

214. Paragraph 214 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 214 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 214 is deemed to contain allegations against Walmart, Walmart denies such allegations.

215. Paragraph 215 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 215 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 215 is deemed to contain allegations against Walmart, Walmart denies such allegations.

216. Paragraph 216 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 216 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 216 is deemed to contain allegations against Walmart, Walmart denies such allegations.

217. Paragraph 217 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 217 are not directed toward

Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 217 is deemed to contain allegations against Walmart, Walmart denies such allegations.

218. Paragraph 218 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 218 are not directed toward Walmart and such allegations do not require a response from Walmart. Moreover, to the extent Paragraph 218 is deemed to contain allegations against Walmart, Walmart denies such allegations.

219. Paragraph 219 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 219 are not directed toward Walmart and such allegations do not require a response from Walmart. Moreover, to the extent Paragraph 219 is deemed to contain allegations against Walmart, Walmart denies such allegations.

220. Paragraph 220 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 220 are not directed toward Walmart and such allegations do not require a response from Walmart. Moreover, to the extent Paragraph 220 is deemed to contain allegations against Walmart, Walmart denies such allegations.

221. Paragraph 221 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 221 are not directed toward Walmart and such allegations do not require a response from Walmart. Moreover, to the extent Paragraph 221 is deemed to contain allegations against Walmart, Walmart denies such allegations.

222. Paragraph 222 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 222 are not directed toward

Walmart and such allegations do not require a response from Walmart. Moreover, to the extent Paragraph 222 is deemed to contain allegations against Walmart, Walmart denies such allegations.

223. Paragraph 223 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 223 are not directed toward Walmart and such allegations do not require a response from Walmart. Moreover, to the extent Paragraph 223 is deemed to contain allegations against Walmart, Walmart denies such allegations.

224. The allegations in Paragraph 224 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 224 is deemed to contain allegations against Walmart, Walmart denies such allegations.

225. The allegations in Paragraph 225 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 225 is deemed to contain allegations against Walmart, Walmart denies such allegations.

226. The allegations in Paragraph 226 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 226 is deemed to contain allegations against Walmart, Walmart denies such allegations.

227. The allegations in Paragraph 227 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 227 is deemed to contain allegations against Walmart, Walmart denies such allegations.

228. The allegations in Paragraph 228 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 228 is deemed to contain allegations against Walmart, Walmart denies such allegations.

229. The allegations in Paragraph 229 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 229 is deemed to contain allegations against Walmart, Walmart denies such allegations.

230. Walmart denies the allegations in Paragraph 230 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

231. Paragraph 231 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 231 and further denies the remaining allegations in Paragraph 231 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

232. Paragraph 232 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph **232** and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 232, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

233. Walmart denies the allegations in Paragraph 233 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

234. Paragraph 234 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 234 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

235. Walmart denies the allegations in Paragraph 235 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

236. Walmart denies the allegations in Paragraph 236 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 236, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

237. Walmart admits that certain risks and potential harms may arise from filling prescriptions for non-medical purposes. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237; such allegations are therefore deemed to be denied.

238. Paragraph 238 refers to documents that speaks for themselves, and Walmart denies any characterizations thereof. Further, Walmart denies the allegations in Paragraph 238 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

239. Paragraph 239 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Walmart denies the allegations in Paragraph 239 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

240. Walmart has expressed its belief that the abuse of and addiction to prescription drugs is a serious public health issue, as well as its commitment to be part of the solution to prescription drug abuse and addiction. Walmart has also expressed that the health and safety of its customers is a critical priority. Walmart denies the remaining allegations in Paragraph 240 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

241. Paragraph 241 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 241 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 241 is deemed to contain allegations against Walmart, Walmart denies such allegations.

242. Paragraph 242 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 242 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 242 is deemed to contain allegations against Walmart, Walmart denies such allegations.

243. Paragraph 243 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Walmart has expressed support for the state of emergency declaration on opioids, its belief that the abuse of and addiction to prescription drugs is a serious public health issue, and its commitment to be part of the solution to prescription drug abuse and addiction. Walmart has also identified certain steps that it has taken to help address the prescription drug abuse problem, as well as certain additional steps it plans to implement.

244. Paragraph 244 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 244 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 244, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

245. Paragraph 245 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 245 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

246. Paragraph 246 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 246 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

247. The allegations in Paragraph 247 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 247 is deemed to contain allegations against Walmart, Walmart denies such allegations.

248. Paragraph 248 refers to documents that speaks for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 248 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such

allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 248 is deemed to contain allegations against Walmart, Walmart denies such allegations.

249. Paragraph 249 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 249 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 249 is deemed to contain allegations against Walmart, Walmart denies such allegations.

250. Paragraph 250 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, Walmart denies the allegations in Paragraph 250 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

251. Paragraph 251 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 251 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 251 is deemed to contain allegations against Walmart, Walmart denies such allegations.

252. Paragraph 252 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 252 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such

allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 252 is deemed to contain allegations against Walmart, Walmart denies such allegations.

253. Paragraph 253 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 253 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 253 is deemed to contain allegations against Walmart, Walmart denies such allegations.

254. Paragraph 254 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 254 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 254 is deemed to contain allegations against Walmart, Walmart denies such allegations.

255. Paragraph 255 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 255 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 255 is deemed to contain allegations against Walmart, Walmart denies such allegations.

256. Paragraph 256 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, Walmart admits it entered into a settlement agreement with

the U.S. Attorney's Office for the Southern District of Texas in 2009. The settlement agreement speaks for itself, and Walmart denies any characterizations thereof.

257. Paragraph 257 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 257 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

258. Walmart denies the allegations in Paragraph 258 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 258, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

259. Walmart denies the allegations in Paragraph 259 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 259, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

260. Walmart denies the allegations in Paragraph 260 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 260, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

261. Walmart denies the allegations in Paragraph 261 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 261, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

262. Walmart denies the allegations in Paragraph 262 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 262, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

263. Paragraph 263 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 263 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 263, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

264. The allegations in Paragraph 264 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 264 is deemed to contain allegations against Walmart, Walmart denies such allegations.

265. Paragraph 265 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, while Walmart is aware of reports regarding drug overdose, Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 265; such allegations are therefore deemed to be denied.

266. Paragraph 266 purports to describe governmentally-disclosed ARCOS data that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining

allegations in Paragraph 266 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

267. Paragraph 267 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267; such allegations are therefore deemed to be denied.

268. The allegations in Paragraph 268 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 268 is deemed to contain allegations against Walmart, Walmart denies such allegations.

269. The allegations in Paragraph 269 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 269 is deemed to contain allegations against Walmart, Walmart denies such allegations.

270. The allegations in Paragraph 270 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 270 is deemed to contain allegations against Walmart, Walmart denies such allegations.

271. The allegations in Paragraph 271 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 271 is deemed to contain allegations against Walmart, Walmart denies such allegations.

272. The allegations in Paragraph 272 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 272 is deemed to contain allegations against Walmart, Walmart denies such allegations.

273. The allegations in Paragraph 273 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 273 is deemed to contain allegations against Walmart, Walmart denies such allegations.

274. Paragraph 274 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 274 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 274, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

275. Paragraph 275 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 275 and

further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 275, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

276. Paragraph 276 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 276 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

277. Paragraph 277 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 277 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 277, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

278. Paragraph 278 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 278 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

279. Paragraph 279 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 279 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

280. Paragraph 280 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 280 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

281. Paragraph 281 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 281 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

282. Walmart denies the allegations in Paragraph 282 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

283. Walmart denies the allegations in Paragraph 283 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

284. Paragraph 284 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 284 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

285. Paragraph 285 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 285 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

286. Paragraph 286 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 286 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

287. Paragraph 287 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 287 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

288. Paragraph 288 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 288 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

289. Paragraph 289 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 289 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 289, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

290. Paragraph 290 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 290 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 290, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

291. Paragraph 291 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 291 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 291, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

292. Paragraph 292 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 292 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 292, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

293. Paragraph 293 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 293 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 293, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

294. Paragraph 294 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 294 and further denies the remaining allegations contained therein to the extent they apply to Walmart.

Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 294, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

295. Paragraph 295 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 295 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 295, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

296. The allegations in Paragraph 296 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 296 is deemed to contain allegations against Walmart, Walmart denies such allegations.

297. Paragraph 297 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 297 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 297 is deemed to contain allegations against Walmart, Walmart denies such allegations.

298. The allegations in Paragraph 298 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 298 is deemed to contain allegations against Walmart, Walmart denies such allegations.

299. The allegations in Paragraph 299 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 299 is deemed to contain allegations against Walmart, Walmart denies such allegations.

300. The allegations in Paragraph 300 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 300 is deemed to contain allegations against Walmart, Walmart denies such allegations.

301. The allegations in Paragraph 301 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 301 is deemed to contain allegations against Walmart, Walmart denies such allegations.

302. The allegations in Paragraph 302 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 302 is deemed to contain allegations against Walmart, Walmart denies such allegations.

303. The allegations in Paragraph 303 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 303 is deemed to contain allegations against Walmart, Walmart denies such allegations.

304. Paragraph 304 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 304 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 304 is deemed to contain allegations against Walmart, Walmart denies such allegations.

305. Paragraph 305 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 305 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 305 is deemed to contain allegations against Walmart, Walmart denies such allegations.

306. Paragraph 306 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 306 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 306 is deemed to contain allegations against Walmart, Walmart denies such allegations.

307. Paragraph 307 refers to a document that speaks for itself, and Walmart denies any characterizations thereof. Further, the allegations in Paragraph 307 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 307 is deemed to contain allegations against Walmart, Walmart denies such allegations.

308. The allegations in Paragraph 308 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 308 is deemed to contain allegations against Walmart, Walmart denies such allegations.

309. The allegations in Paragraph 309 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 309 is deemed to contain allegations against Walmart, Walmart denies such allegations.

310. The allegations in Paragraph 310 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 310 is deemed to contain allegations against Walmart, Walmart denies such allegations.

311. The allegations in Paragraph 311 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without

knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 311 is deemed to contain allegations against Walmart, Walmart denies such allegations.

312. The allegations in Paragraph 312 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 312 is deemed to contain allegations against Walmart, Walmart denies such allegations.

313. The allegations in Paragraph 313 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 313 is deemed to contain allegations against Walmart, Walmart denies such allegations.

314. The allegations in Paragraph 314 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 314 is deemed to contain allegations against Walmart, Walmart denies such allegations.

315. The allegations in Paragraph 315 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 315 is deemed to contain allegations against Walmart, Walmart denies such allegations.

316. The allegations in Paragraph 316 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 316 is deemed to contain allegations against Walmart, Walmart denies such allegations.

317. The allegations in Paragraph 317 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 317 is deemed to contain allegations against Walmart, Walmart denies such allegations.

318. The allegations in Paragraph 318 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 318 is deemed to contain allegations against Walmart, Walmart denies such allegations.

319. The allegations in Paragraph 319 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 319 is deemed to contain allegations against Walmart, Walmart denies such allegations.

320. The allegations in Paragraph 320 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 320 is deemed to contain allegations against Walmart, Walmart denies such allegations.

321. The allegations in Paragraph 321 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 321 is deemed to contain allegations against Walmart, Walmart denies such allegations.

322. The allegations in Paragraph 322 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 322 is deemed to contain allegations against Walmart, Walmart denies such allegations.

323. The allegations in Paragraph 323 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 323 is deemed to contain allegations against Walmart, Walmart denies such allegations.

324. The allegations in Paragraph 324 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 324 is deemed to contain allegations against Walmart, Walmart denies such allegations.

325. The allegations in Paragraph 325 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 325 is deemed to contain allegations against Walmart, Walmart denies such allegations.

326. The allegations in Paragraph 326 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 326 is deemed to contain allegations against Walmart, Walmart denies such allegations.

327. The allegations in Paragraph 327 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 327 is deemed to contain allegations against Walmart, Walmart denies such allegations.

328. The allegations in Paragraph 328 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 328 is deemed to contain allegations against Walmart, Walmart denies such allegations.

329. Paragraph 329 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 329 and further denies the remaining allegations contained therein to the extent they apply to Walmart.

Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 329, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

330. Paragraph 330 refers to documents that speak for themselves, and Walmart denies any characterizations thereof. Further, Walmart denies the allegations in Paragraph 330 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

331. Paragraph 331 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 331. Further, Paragraph 331 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 331 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 331, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

332. Paragraph 332 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 332 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 332, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

333. Paragraph 333 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 333 and

further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 333, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

334. Walmart denies the allegations in Paragraph 334 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

335. Paragraph 335 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 335. Further, Paragraph 335 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 335 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 335, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

336. Paragraph 336 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 336 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 336, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

337. Paragraph 337 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 337 and

further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 337, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

338. Paragraph 338 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 338 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 338, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

339. Paragraph 339 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 339 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 339, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

340. Paragraph 340 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 340 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 340, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

341. Paragraph 341 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 341 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 341, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

342. Paragraph 342 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 342 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 342, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

343. Paragraph 343 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 343 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 343, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

344. Paragraph 344 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 344 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 344, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

345. Paragraph 345 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 345 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

346. Paragraph 346 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 346 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 346, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

347. Paragraph 347 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 347 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 347, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

348. Paragraph 348 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 348. Further, Paragraph 348 purports to recite law and refers to documents that speak for themselves,

and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 348 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 348, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

349. Paragraph 349 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 349 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 349, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

350. Paragraph 350 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 350 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

351. Paragraph 351 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 351 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

352. Paragraph 352 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 352 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 352, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

ANSWER TO FIRST CLAIM FOR RELIEF

353. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

354. The allegations in Paragraph 354 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 354 is deemed to contain allegations against Walmart, Walmart denies such allegations.

355. The allegations in Paragraph 355 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 355 is deemed to contain allegations against Walmart, Walmart denies such allegations.

356. The allegations in Paragraph 356 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 356 is deemed to contain allegations against Walmart, Walmart denies such allegations.

357. The allegations in Paragraph 357 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 357 is deemed to contain allegations against Walmart, Walmart denies such allegations.

358. The allegations in Paragraph 358 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 358 is deemed to contain allegations against Walmart, Walmart denies such allegations.

359. The allegations in Paragraph 359 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 359 is deemed to contain allegations against Walmart, Walmart denies such allegations.

360. The allegations in Paragraph 360 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 360 is deemed to contain allegations against Walmart, Walmart denies such allegations.

361. The allegations in Paragraph 361 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 361 is deemed to contain allegations against Walmart, Walmart denies such allegations.

362. The allegations in Paragraph 362 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 362 is deemed to contain allegations against Walmart, Walmart denies such allegations.

363. The allegations in Paragraph 363 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 363 is deemed to contain allegations against Walmart, Walmart denies such allegations.

364. The allegations in Paragraph 364 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 364 is deemed to contain allegations against Walmart, Walmart denies such allegations.

365. The allegations in Paragraph 365 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 365 is deemed to contain allegations against Walmart, Walmart denies such allegations.

366. The allegations in Paragraph 366 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 366 is deemed to contain allegations against Walmart, Walmart denies such allegations.

367. The allegations in Paragraph 367 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 367 is deemed to contain allegations against Walmart, Walmart denies such allegations.

368. The allegations in Paragraph 368 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 368 is deemed to contain allegations against Walmart, Walmart denies such allegations.

369. The allegations in Paragraph 369 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 369 is deemed to contain allegations against Walmart, Walmart denies such allegations.

370. The allegations in Paragraph 370 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 370 is deemed to contain allegations against Walmart, Walmart denies such allegations.

371. The allegations in Paragraph 371 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 371 is deemed to contain allegations against Walmart, Walmart denies such allegations.

372. The allegations in Paragraph 372 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 372 is deemed to contain allegations against Walmart, Walmart denies such allegations.

373. The allegations in Paragraph 373 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 373 is deemed to contain allegations against Walmart, Walmart denies such allegations.

374. The allegations in Paragraph 374 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 374 is deemed to contain allegations against Walmart, Walmart denies such allegations.

375. The allegations in Paragraph 375 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 375 is deemed to contain allegations against Walmart, Walmart denies such allegations.

376. The allegations in Paragraph 376 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 376 is deemed to contain allegations against Walmart, Walmart denies such allegations.

377. The allegations in Paragraph 377 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 377 is deemed to contain allegations against Walmart, Walmart denies such allegations.

378. The allegations in Paragraph 378 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 378 is deemed to contain allegations against Walmart, Walmart denies such allegations.

379. The allegations in Paragraph 379 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 379 is deemed to contain allegations against Walmart, Walmart denies such allegations.

ANSWER TO SECOND CLAIM FOR RELIEF

380. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

381. Paragraph 381 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 381 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 381, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

382. Paragraph 382 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 382 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 382, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

383. Paragraph 383 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 383 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

384. Paragraph 384 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 384 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 384, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

385. Paragraph 385 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 385 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 385, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

386. Paragraph 386 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 386 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 386, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

387. Paragraph 387 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 387 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 387, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

388. Paragraph 388 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 388. Further, Paragraph 388 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 388 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 388, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

389. Paragraph 389 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 389. Further, Paragraph 389 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. Walmart denies the remaining allegations in Paragraph 389 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 389, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

390. Paragraph 390 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 390 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

391. Paragraph 391 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 391 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 391, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

392. Paragraph 392 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusion stated in Paragraph 392 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 392, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

393. Paragraph 393 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 393 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 393, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

394. Paragraph 394 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 394 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 394, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

395. Walmart denies the allegations in Paragraph 395 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 395, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

396. Paragraph 396 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 396 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 396, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

397. Paragraph 397 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 397 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 397, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

398. Paragraph 398 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 398 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 398, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

399. Paragraph 399 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 399 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 399, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

400. Paragraph 400 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 400 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 400, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

401. Paragraph 401 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 401 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 401, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

402. Paragraph 402 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 402 and further denies the remaining allegations contained therein to the extent they apply to Walmart.

Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 402, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

403. Paragraph 403 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 403 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 403, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

404. Paragraph 404 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 404 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 404, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

405. Paragraph 405 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 405 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 405, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

406. Paragraph 406 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 406 and

further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 406, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

407. Paragraph 407 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 407 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 407, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

408. Paragraph 408 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 408 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 408, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

ANSWER TO THIRD CLAIM FOR RELIEF

409. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

410. Paragraph 410 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 410 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

411. Paragraph 411 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 411 and

further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 411, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

412. Paragraph 412 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 412 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 412, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

413. Paragraph 413 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 413 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 413, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

414. Walmart denies the allegations in Paragraph 414 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 414, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

415. Walmart denies the allegations in Paragraph 415 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 415, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

416. Walmart denies the allegations in Paragraph 416 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 416, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

417. Walmart denies the allegations in Paragraph 417 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 417, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

418. Paragraph 418 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 418 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 418, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

ANSWER TO FOURTH CLAIM FOR RELIEF

419. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

420. The allegations in Paragraph 420 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 420 is deemed to contain allegations against Walmart, Walmart denies such allegations.

421. The allegations in Paragraph 421 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 421 is deemed to contain allegations against Walmart, Walmart denies such allegations.

422. The allegations in Paragraph 422 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 422 is deemed to contain allegations against Walmart, Walmart denies such allegations.

423. The allegations in Paragraph 423 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 423 is deemed to contain allegations against Walmart, Walmart denies such allegations.

424. The allegations in Paragraph 424 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 424 is deemed to contain allegations against Walmart, Walmart denies such allegations.

425. The allegations in Paragraph 425 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 425 is deemed to contain allegations against Walmart, Walmart denies such allegations.

426. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 426; such allegations are therefore deemed to be denied.

427. The allegations in Paragraph 427 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 427 is deemed to contain allegations against Walmart, Walmart denies such allegations.

428. The allegations in Paragraph 428 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 428 is deemed to contain allegations against Walmart, Walmart denies such allegations.

429. The allegations in Paragraph 429 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 429 is deemed to contain allegations against Walmart, Walmart denies such allegations.

430. The allegations in Paragraph 430 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 430 is deemed to contain allegations against Walmart, Walmart denies such allegations.

431. The allegations in Paragraph 431 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 431 is deemed to contain allegations against Walmart, Walmart denies such allegations.

432. The allegations in Paragraph 432 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 432 is deemed to contain allegations against Walmart, Walmart denies such allegations.

ANSWER TO FIFTH CLAIM FOR RELIEF

433. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

434. The allegations in Paragraph 434 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 434 is deemed to contain allegations against Walmart, Walmart denies such allegations.

435. The allegations in Paragraph 435 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 435 is deemed to contain allegations against Walmart, Walmart denies such allegations.

436. The allegations in Paragraph 436 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 436 is deemed to contain allegations against Walmart, Walmart denies such allegations.

437. The allegations in Paragraph 437 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 437 is deemed to contain allegations against Walmart, Walmart denies such allegations.

438. The allegations in Paragraph 438 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 438 is deemed to contain allegations against Walmart, Walmart denies such allegations.

439. The allegations in Paragraph 439 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 439 is deemed to contain allegations against Walmart, Walmart denies such allegations.

440. The allegations in Paragraph 440 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 440 is deemed to contain allegations against Walmart, Walmart denies such allegations.

441. The allegations in Paragraph 441 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 441 is deemed to contain allegations against Walmart, Walmart denies such allegations.

442. The allegations in Paragraph 442 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 442 is deemed to contain allegations against Walmart, Walmart denies such allegations.

443. The allegations in Paragraph 443 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 443 is deemed to contain allegations against Walmart, Walmart denies such allegations.

444. The allegations in Paragraph 444 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 444 is deemed to contain allegations against Walmart, Walmart denies such allegations.

445. The allegations in Paragraph 445 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 445 is deemed to contain allegations against Walmart, Walmart denies such allegations.

ANSWER TO SIXTH CLAIM FOR RELIEF

446. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

447. The allegations in Paragraph 447 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 447 is deemed to contain allegations against Walmart, Walmart denies such allegations.

448. The allegations in Paragraph 448 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 448 is deemed to contain allegations against Walmart, Walmart denies such allegations.

449. The allegations in Paragraph 449 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore

deemed to be denied. Moreover, to the extent Paragraph 449 is deemed to contain allegations against Walmart, Walmart denies such allegations.

450. The allegations in Paragraph 450 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 450 is deemed to contain allegations against Walmart, Walmart denies such allegations.

ANSWER TO SEVENTH CLAIM FOR RELIEF

451. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

452. Paragraph 452 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 452 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 452, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

453. Paragraph 453 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 453 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 453, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

454. Paragraph 454 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 454 and

further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 454, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

455. Paragraph 455 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 455 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 455, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

456. Paragraph 456 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 456 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 456, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

457. Paragraph 457 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 457 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 457, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

458. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458; such allegations are therefore deemed to be denied.

459. Paragraph 459 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 459 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 459, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

460. Paragraph 460 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 460 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

461. Paragraph 461 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 461 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

462. Paragraph 462 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 462 and further denies the remaining allegations contained therein to the extent they apply to Walmart.

Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 462, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

463. Paragraph 463 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 463 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

464. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464 pertaining to purported economic damages; such allegations are therefore deemed to be denied. Further, Paragraph 464 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 464 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

ANSWER TO EIGHTH CLAIM FOR RELIEF

465. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

466. Paragraph 466 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 466 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 466, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

467. Paragraph 467 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 467. Further, Paragraph 467 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 467 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

468. Paragraph 468 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 468 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 468, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

469. Paragraph 469 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 469. Further, Paragraph 469 purports to recite law that speaks for itself, and Walmart denies any characterizations thereof. To the extent Paragraph 469 contains allegations of wrongdoing, Walmart denies such allegations to the extent they apply to Walmart.

470. Walmart denies the allegations in Paragraph 470 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 470, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

471. Paragraph 471 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 471 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 471, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

472. Paragraph 472 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 472 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 472, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

473. Paragraph 473 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 473 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 473, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

474. Paragraph 474 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 474 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 474, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

475. Paragraph 475 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 475 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 475, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

476. Paragraph 476 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 476 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 476, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

477. Paragraph 477 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 477 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 477, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

478. Paragraph 478 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 478 and further denies the remaining allegations contained therein to the extent they apply to Walmart.

Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 478, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

ANSWER TO NINTH CLAIM FOR RELIEF

479. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

480. Walmart is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480 pertaining to purported expenses; such allegations are therefore deemed to be denied. Further, Walmart denies the allegations in Paragraph 480 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

481. Walmart denies the allegations in Paragraph 481 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 481, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

482. Paragraph 482 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 482 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

483. Walmart denies the allegations in Paragraph 483 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 483, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

484. Paragraph 484 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 484 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 484, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

ANSWER TO TENTH CLAIM FOR RELIEF

485. Walmart incorporates by reference its answers to all other allegations in this Answer as if fully set forth herein.

486. The allegations in Paragraph 486 are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied. Moreover, to the extent Paragraph 486 is deemed to contain allegations against Walmart, Walmart denies such allegations.

487. Paragraph 487 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 487 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 487, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

488. Paragraph 488 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 488 and

further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 488, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

489. Paragraph 489 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 489 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 489, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

490. Walmart denies the allegations in Paragraph 490 to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 490, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

491. Paragraph 491 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 491 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 491, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

492. Paragraph 492 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 492 and further denies the remaining allegations contained therein to the extent they apply to Walmart.

Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 492, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

493. Paragraph 493 states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in Paragraph 493 and further denies the remaining allegations contained therein to the extent they apply to Walmart. Walmart is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 493, including to the extent those allegations apply to another defendant; such allegations are therefore deemed to be denied.

ANSWER TO PRAYER FOR RELIEF

494. This unnumbered paragraph states legal conclusions to which no response is required. To the extent a response is required, Walmart denies the legal conclusions stated in this unnumbered paragraph and further denies the remaining allegations contained therein to the extent they apply to Walmart. Moreover, the remaining allegations in this unnumbered paragraph are not directed toward Walmart and therefore do not require a response. To the extent such allegations require a response, Walmart is without knowledge or information sufficient to form a belief as to their truth; such allegations are therefore deemed to be denied.

AFFIRMATIVE AND OTHER DEFENSES

Having answered the allegations of Plaintiff's Complaint, and having denied any liability whatsoever, Walmart further denies any allegations that have not been expressly admitted and sets forth below its defenses. By setting forth these defenses, Walmart does not assume the burden of proving any fact, issue, or element of a cause of action where such burden properly belongs to Plaintiff. Moreover, Walmart does not intend these defenses to be, nor shall they be construed as, an acknowledgement that any particular issue or subject matter is relevant to Plaintiff's allegations. Walmart does not admit or acknowledge that it bears the burden of proof or burden of persuasion with respect to any such defense. Upon completion of discovery, if the facts warrant, Walmart may withdraw any of these defenses as may be appropriate. Walmart reserves the right to (i) rely on any other applicable defenses set forth in any answer or listing of affirmative defenses of any other party in this Action, (ii) rely on any other defenses that may become apparent during fact or expert discovery in this matter, and (iii) to amend its Answer to assert any such defenses.

FIRST DEFENSE

The Complaint fails to state facts sufficient to support a claim upon which relief may be granted against Walmart.

SECOND DEFENSE

Plaintiff's claims are barred by the applicable statutes of limitations.

THIRD DEFENSE

Plaintiff's claims are barred by the applicable statutes of repose.

FOURTH DEFENSE

Plaintiff's claims are barred by the doctrine of laches.

FIFTH DEFENSE

Plaintiff's claims are barred or limited for lack of standing.

SIXTH DEFENSE

Plaintiff's claims are barred by the voluntary payment doctrine.

SEVENTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because Plaintiff lacks capacity to bring its claims, including claims indirectly maintained on behalf of its members and claims brought as *parens patriae*.

EIGHTH DEFENSE

Plaintiff's claims are barred because Plaintiff is not the real party in interest.

NINTH DEFENSE

Plaintiff's claims are not ripe and/or have been mooted.

TENTH DEFENSE

Plaintiff's claims and damages are barred or limited, in whole or in part, by common law, statutory, and state constitutional constraints on the exercise of police powers.

ELEVENTH DEFENSE

Plaintiff's claims and damages are barred or limited, in whole or in part, by the political question and separation of powers doctrines and because its state-law claims implicate issues of statewide importance that are reserved for state regulation.

TWELFTH DEFENSE

Plaintiff's claims are barred by the doctrine of unclean hands.

THIRTEENTH DEFENSE

Plaintiff's claims are barred by the doctrine of *in pari delicto*.

FOURTEENTH DEFENSE

Plaintiff's claims are barred, in whole or in part, for failure to exhaust administrative remedies or to satisfy other procedural prerequisites.

FIFTEENTH DEFENSE

Plaintiff's claims are barred by the doctrines of estoppel, waiver, and/or ratification.

SIXTEENTH DEFENSE

Plaintiff's claims may be barred by the doctrines of res judicata and collateral estoppel from all forms of relief sought in the Complaint.

SEVENTEENTH DEFENSE

Venue may be improper and/or inconvenient in this Court.

EIGHTEENTH DEFENSE

Plaintiff has failed to join all necessary parties, including without limitation health care providers, prescribers, patients, and other third parties whom Plaintiff alleges engaged in the unauthorized or illicit prescription, dispensing, diversion, or use of prescription opioid products.

NINETEENTH DEFENSE

Plaintiff's claims against Walmart do not arise out of the same transactions or occurrences as its claims against other defendants, as required for joinder of parties.

TWENTIETH DEFENSE

Plaintiff's claims are barred to the extent they relate to Walmart's alleged lobbying or other activities protected by the First Amendment to the Constitution of the United States or by the Constitution of the States of Oklahoma or that of any state whose laws may apply.

TWENTY-FIRST DEFENSE

Plaintiff's claims are barred, in whole or in part, to the extent that they violate the Due Process or Ex Post Facto clauses of the United States or applicable State constitution.

TWENTY-SECOND DEFENSE

Walmart's rights under the Due Process Clause of the U.S. Constitution and applicable State Constitution or statute are violated by any financial or other arrangement that might distort a

government attorney's duty to pursue justice rather than his or her personal interests, financial or otherwise, in the context of a civil enforcement proceeding, including by Plaintiff's use of a contingency fee contract with private counsel.

TWENTY-THIRD DEFENSE

Plaintiff's claims are barred, in whole or in part, to the extent that they violate the Dormant Commerce Clause of the United States Constitution.

TWENTY-FOURTH DEFENSE

Walmart denies all types of causation, including without limitation, cause in fact, proximate cause and producing cause, with respect to the claims asserted against Walmart.

TWENTY-FIFTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because Walmart did not proximately cause the damages complained of, and because the acts of other persons (including individuals engaged in the illegal distribution or use of opioids without a proper prescription) intervened between Walmart's acts and Plaintiff's harms. Walmart had no legal duty to protect Plaintiff from the intentional criminal acts of third persons, which are superseding causes that extinguish any liability.

TWENTY-SIXTH DEFENSE

The injuries and damages claimed by Plaintiff resulted from an intervening or superseding cause and/or causes, and any act or omission on the part of Walmart was not the proximate and/or competent producing cause of such alleged injuries and damages.

TWENTY-SEVENTH DEFENSE

Plaintiff's injuries and damages, if any, were due to misuse, illicit use, or abuse of the medications at issue on the part of the medication users, for which Walmart is not liable.

TWENTY-EIGHTH DEFENSE

Any injuries and/or damages sustained by Plaintiff may have been caused or contributed to by the negligence or actual conduct of Plaintiff and/or other persons, firms, corporations, or entities over which Walmart had no control or right of control and for whom it is not responsible.

TWENTY-NINTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because its alleged injuries or damages were caused by unforeseeable and uncontrollable forces over which Walmart had no control and for which Walmart is not responsible, including without limitation pre-existing or unrelated medical conditions.

THIRTIETH DEFENSE

Plaintiff's claims are barred, in whole or in part, because any and all damages alleged by Plaintiff were caused by misuse of the products involved, failure to use the products properly, and/or alteration or modification of, or criminal misuse or abuse of, the prescribed medications by third parties over whom Walmart had no control, for whom Walmart was not responsible, and that operated as superseding causes that extinguish any liability.

THIRTY-FIRST DEFENSE

Plaintiff would be unjustly enriched if allowed to recover on any of its claims.

THIRTY-SECOND DEFENSE

Plaintiff's claims are barred in whole or in part because Plaintiff suffered no injuries or damages as a result of any action by Walmart.

THIRTY-THIRD DEFENSE

Plaintiff's claims are barred, in whole or in part, because the derivative injury rule and the remoteness doctrine bar Plaintiff from recovering payments that it allegedly made on behalf of its

members to reimburse any expenses for health care, pharmaceutical care, and/or other public services.

THIRTY-FOURTH DEFENSE

Plaintiff's claims are barred to the extent that Walmart has valid defenses that bar recovery by those persons on whose behalf Plaintiff purportedly seeks recovery.

THIRTY-FIFTH DEFENSE

Plaintiff's claims are subject to all defenses that could be asserted if Plaintiff's claims were properly made by individuals on whose behalf or for whose alleged damages Plaintiff seeks to recover.

THIRTY-SIXTH DEFENSE

Plaintiff has failed to comply with the requirement that it identify each patient in whose claim(s) it has a subrogation interest and on whose behalf it has incurred costs.

THIRTY-SEVENTH DEFENSE

Plaintiff fails to plead that it reimbursed any prescriptions for any opioid distributed by Walmart that harmed patients and should not have been prescribed or distributed, that Walmart caused any health care provider to write any ineffective or harmful opioid prescriptions, or that any specific prescription was unauthorized, medically unnecessary, ineffective, or harmful.

THIRTY-EIGHTH DEFENSE

Plaintiff's claims are barred to the extent that Plaintiff's alleged damages are speculative, uncertain, and hypothetical.

THIRTY-NINTH DEFENSE

Any recovery by Plaintiff may be barred, in whole or in part, by the principle of comparative or contributory fault.

FORTIETH DEFENSE

Any recovery against Walmart is barred or limited under the principles of assumption of the risk and informed consent.

FORTY-FIRST DEFENSE

Plaintiff's damages, if any, were caused by the active, direct, and proximate negligence or actual conduct of entities or persons other than Walmart, and in the event that Walmart is found to be liable to Plaintiff, Walmart will be entitled to indemnification, contribution, and/or apportionment.

FORTY-SECOND DEFENSE

Walmart asserts its right to a proportionate reduction of any damages found against Walmart based on the negligence or other conduct of any settling tortfeasor and/or responsible third party and/or Plaintiff.

FORTY-THIRD DEFENSE

A specific percentage of the tortious conduct that proximately caused the injury or loss to person or property is attributable to (i) Plaintiff, (ii) other parties from whom Plaintiff seeks recovery, and (iii) persons from whom Plaintiff does not seek recovery in this action, including, but not limited to, prescribing practitioners, non-party pharmacies and pharmacists, individuals and entities involved in diversion and distribution of prescription opioids, individuals and entities involved in import, distribution, and sale of illegal opioids, individuals involved in procuring diverted prescription opioids and/or illegal drugs, delivery services, federal, state, and local government entities, and health insurers and pharmacy benefit managers. Okla. Stat. tit. 23, §§ 13-14.

FORTY-FOURTH DEFENSE

Any verdict or judgment that might be recovered by Plaintiff must be reduced by those amounts that have already indemnified or with reasonable certainty will indemnify Plaintiff in whole or in part for any past or future claimed economic loss from any collateral source or any other applicable law.

FORTY-FIFTH DEFENSE

If Walmart is found liable for Plaintiff's alleged injuries and losses (which liability is specifically denied), the facts will show that any recovery by Plaintiff must be reduced pursuant to Okla. Stat. tit. 23, §§ 13-14, to account for the acts or omissions attributable to Plaintiff.

FORTY-SIXTH DEFENSE

The damages which Plaintiff may be entitled to recover if liability is established (which liability is specifically denied) are capped pursuant to Okla. Stat. tit. 23, § 9.1.

FORTY-SEVENTH DEFENSE

Any damages that Plaintiff may recover against Walmart must be reduced to the extent that Plaintiff is seeking damages for alleged injuries or expenses related to the same user(s) of the subject drugs, or damages recovered or recoverable by other actual or potential plaintiffs. Any damages that Plaintiff may recover against Walmart must be reduced to the extent they unjustly enrich Plaintiff.

FORTY-EIGHTH DEFENSE

Plaintiff's claims against Walmart are barred to the extent they rely, explicitly or implicitly, on a theory of market-share liability.

FORTY-NINTH DEFENSE

Plaintiff's claims against Walmart are barred or limited by the economic loss rule.

FIFTIETH DEFENSE

Plaintiff is barred, in whole or in part, from recovering costs incurred in providing public services by the free public services doctrine and/or municipal cost recovery rule.

FIFTY-FIRST DEFENSE

Plaintiff may have failed or refused to exercise reasonable care and diligence to avoid loss and minimize damages and, therefore, may not recover for losses that could have been prevented by reasonable efforts on its part, or by expenditures which might reasonably have been made. Recovery, if any, should therefore be reduced by Plaintiff's failure to mitigate damages, if any.

FIFTY-SECOND DEFENSE

To the extent Plaintiff attempts to seek equitable relief, Plaintiff is not entitled to such relief because Plaintiff has an adequate remedy at law.

FIFTY-THIRD DEFENSE

Plaintiff's claims are barred, in whole or in part, because federal agencies have exclusive or primary jurisdiction over the matters asserted in the Complaint.

FIFTY-FOURTH DEFENSE

Plaintiff's claims are preempted by federal law, including (without limitation) the federal Controlled Substances Act and the Food, Drug, and Cosmetic Act ("FDCA").

FIFTY-FIFTH DEFENSE

The conduct of Walmart conformed with the FDCA and the requirements of the Food and Drug Administration ("FDA"), and the activities of Walmart alleged in the Complaint conformed with all state and federal statutes, regulations, and industry standards based on the state of knowledge at the relevant time(s) alleged in the Complaint.

FIFTY-SIXTH DEFENSE

Plaintiff's claims are barred, in whole or in part, by conflict preemption as set forth in the United States Supreme Court's decisions in *PLIVA, Inc. v. Mensing*, 131 S. Ct. 2567 (2011), and *Mutual Pharm. Co. v. Bartlett*, 133 S. Ct. 2466 (2013).

FIFTY-SEVENTH DEFENSE

Plaintiff's claims are preempted insofar as they conflict with Congress's purposes and objectives in enacting relevant federal legislation and authorizing regulations, including the Hatch-Waxman Amendments to the FDCA and implementing regulations. *See Geier v. Am. Honda Co.*, 529 U.S. 861 (2000).

FIFTY-EIGHTH DEFENSE

To the extent Plaintiff asserts claims that depend solely on violations of federal law, including any claims of a "fraud on the FDA" with respect to the Manufacturer Defendants' disclosure of information relating to the safety of their medications at issue, such claims are barred and should be dismissed. *See Buckman v. Plaintiffs' Legal Comm'n*, 531 U.S. 341 (2001).

FIFTY-NINTH DEFENSE

To the extent Plaintiff asserts claims that depend solely on violations of federal law, including any claims of "fraud on the Drug Enforcement Administration" ("DEA") with respect to Walmart's compliance with statutes or regulations administered and/or enforced by the DEA, such claims are barred and should be dismissed. *See Buckman v. Plaintiffs' Legal Comm'n*, 531 U.S. 341 (2001).

SIXTIETH DEFENSE

Plaintiff's claims are barred, in whole or in part, by the deference that common law accords discretionary actions by the FDA under the FDCA and discretionary actions by the DEA under the Controlled Substances Act.

SIXTY-FIRST DEFENSE

If Plaintiff incurred the damages alleged, which is expressly denied, Walmart is not liable for damages because the methods, standards, or techniques of designing, manufacturing, labeling, and distributing the prescription medications at issue complied with and were in conformity with the laws and regulations of the Controlled Substances Act, the FDCA, and the generally recognized state of the art in the industry at the time the product was designed, manufactured, labeled, and distributed.

SIXTY-SECOND DEFENSE

Plaintiff's claims are barred to the extent they are based on any allegations involving failure to provide adequate warnings or information because all warnings or information that accompanied the allegedly distributed products were approved by the United States Food & Drug Administration for a product approved under the Federal Food, Drug, and Cosmetic Act (21 U.S.C. Section 301 et seq.), as amended, or Section 351, Public Health Service Act (42 U.S.C. Section 262), as amended, or the warnings and information provided were those stated in monographs developed by the United States Food & Drug Administration for pharmaceutical products that may be distributed without an approved new drug application.

SIXTY-THIRD DEFENSE

Plaintiff's claims are barred in whole or in part by the learned intermediary doctrine.

SIXTY-FOURTH DEFENSE

Walmart did not owe or breach any statutory or common law duty to Plaintiff.

SIXTY-FIFTH DEFENSE

Walmart appropriately, completely, and fully performed and discharged any and all obligations and legal duties arising out of the matters alleged in the Complaint.

SIXTY-SIXTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because Walmart complied at all relevant times with all applicable laws, including all legal and regulatory duties.

SIXTY-SEVENTH DEFENSE

To the extent that Plaintiff relies on letters or other informal guidance from the DEA to establish Walmart's regulatory duties, such informal guidance cannot enlarge Walmart's regulatory duties in the absence of compliance by DEA with the requirements of the Administrative Procedure Act, 5 U.S.C. § 551 *et seq.*

SIXTY-EIGHTH DEFENSE

Plaintiff's claims are barred to the extent they are based on alleged violations of industry customs because purported industry customs do not create legal duties on Walmart.

SIXTY-NINTH DEFENSE

The claims asserted in the Complaint are barred, in whole or in part, by the Restatement (Second) of Torts § 402A, Comments j and k, and Restatement (Third) of Torts: Products Liability § 6.

SEVENTIETH DEFENSE

Plaintiff's claims are barred in whole or in part, or are subject to other limitations, by the Oklahoma Product Liability Act.

SEVENTY-FIRST DEFENSE

To the extent that Plaintiff is alleging fraud, fraudulent concealment, or similar conduct, Plaintiff has failed to plead fraud with sufficient particularity.

SEVENTY-SECOND DEFENSE

Plaintiff fails to plead any actionable misrepresentation or omission made by or attributable to Walmart.

SEVENTY-THIRD DEFENSE

Plaintiff's claims are barred in whole or in part because no conduct of Walmart was misleading, unfair, or deceptive.

SEVENTY-FOURTH DEFENSE

Plaintiff's claims may be barred, in whole or in part, because neither the users of the subject prescription medications nor their prescribers, nor Plaintiff itself, relied to their detriment upon any statement by Walmart in determining to use or prescribe the medications at issue.

SEVENTY-FIFTH DEFENSE

Walmart is not liable for any statements in the Manufacturer Defendants' branded or unbranded materials.

SEVENTY-SIXTH DEFENSE

Plaintiff's nuisance claims are barred to the extent that it lacks the statutory authority to bring a nuisance claim under Oklahoma law.

SEVENTY-SEVENTH DEFENSE

Plaintiff's common law and statutory public nuisance claims are barred or limited to the extent that they have been abrogated or otherwise curtailed by Oklahoma's innocent seller statute, Okla. Stat. tit. 76, § 57.2(G).

SEVENTY-EIGHTH DEFENSE

Plaintiff's claim of public nuisance is barred or limited because no action of Walmart involved interference with real property; illegal conduct perpetrated by third parties involving the use of an otherwise legal product does not involve a public right against the distributor sufficient to state a claim for public nuisance; the alleged public nuisance would have impermissible extraterritorial reach; and the alleged conduct of Walmart is too remote from the alleged injury as a matter of law and due process.

SEVENTY-NINTH DEFENSE

Plaintiff's claim for unjust enrichment is barred or limited because Walmart did not receive and retain any alleged benefit from Plaintiff.

EIGHTIETH DEFENSE

Plaintiff's claims are barred, reduced, and/or limited pursuant to the applicable state statutory and common law regarding limitations of awards, caps on recovery, and setoffs.

EIGHTY-FIRST DEFENSE

Plaintiff's claims are barred, reduced, and/or limited to the extent that Walmart is entitled to a credit or setoff for any and all sums Plaintiff has received in the way of any and all settlements.

EIGHTY-SECOND DEFENSE

Walmart's liability, if any, will not result from its conduct but is solely the result of an obligation imposed by law, and thus Walmart is entitled to complete indemnity, express or implied, by other parties.

EIGHTY-THIRD DEFENSE

Plaintiff's claims for punitive or exemplary damages or other civil penalties are barred or reduced by applicable law or statute or, in the alternative, are unconstitutional insofar as they violate the Due Process Clauses of the United States Constitution, the Excessive Fines Clause of the Eighth Amendment of the United States Constitution, the Full Faith and Credit Clause of the United States Constitution, the Double Jeopardy Clause of the Fifth Amendment to the United States Constitution, the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution, the Sixth Amendment to the United States Constitution, and applicable provisions of the Constitution of Oklahoma, or that of any other state whose laws may apply. Any law, statute or other authority purporting to permit the recovery of punitive damages or civil penalties in this case is unconstitutional, facially and as applied, to the extent that, without limitation, it:

- (1) lacks constitutionally sufficient standards to guide and restrain the jury's discretion in determining whether to award punitive damages or civil penalties and/or the amount, if any;
- (2) is void for vagueness in that it fails to provide adequate advance notice as to what conduct will result in punitive damages or civil penalties;
- (3) unconstitutionally may permit recovery of punitive damages or civil penalties based on harms to third parties, out-of-state conduct, conduct that complied with applicable law, or conduct that was not directed, or did not proximately cause harm, to Plaintiff;
- (4) permits the imposition of punitive damages where the burden of proof is less than clear and convincing evidence;
- (5) permits the imposition of punitive damages without bifurcating the trial and trying all punitive damages issues separately, only if and after a finding on the merits of the liability of Walmart;
- (6) permits the imposition of punitive damages without any predetermined limit on any such award;
- (7) permits an imposition of punitive damages that allows for multiple punishments for the same alleged act(s) or omission(s);
- (8) unconstitutionally may permit recovery of punitive damages or civil penalties in an amount that is not both reasonable and proportionate to the amount of harm, if any, to Plaintiffs, and to the amount of compensatory damages, if any;
- (9) unconstitutionally may permit jury consideration of net worth or other financial information relating to Defendants;

(10) lacks constitutionally sufficient standards to be applied by the trial court in post-verdict review of any award of punitive damages or civil penalties;

(11) lacks constitutionally sufficient standards for appellate review of any award of punitive damages or civil penalties;

(12) would unconstitutionally impose a penalty, criminal in nature, without according to Defendants the same procedural protections that are accorded to criminal defendants under the constitutions of the United States, Oklahoma, and any other state whose laws may apply; and

(13) otherwise fails to satisfy Supreme Court precedent, including, without limitation, *Pacific Mut. Life Ins. Co. v. Haslip*, 499 U.S. 1 (1991); *TXO Production Corp. v. Alliance Resources, Inc.*, 509 U.S. 443 (1993); *BMW of N. Am. v. Gore*, 517 U.S. 559 (1996); *State Farm Ins. Co. v. Campbell*, 538 U.S. 408 (2003); and *Philip Morris USA v. Williams*, 549 U.S. 346 (2007).

EIGHTY-FOURTH DEFENSE

To the extent that Plaintiff seeks punitive, exemplary, or aggravated damages, any such damages are barred because the product at issue, and its labeling, were subject to and received pre-market approval by the FDA under 52 Stat. 1040, 21 U.S.C. § 301.

EIGHTY-FIFTH DEFENSE

Plaintiff's claims for punitive or exemplary damages are barred because Plaintiff cannot prove by clear and convincing evidence that Walmart was grossly negligent and Walmart has neither acted nor failed to act in a manner that entitles Plaintiff to recover punitive or exemplary damages.

EIGHTY-SIXTH DEFENSE

Plaintiff cannot obtain relief on their claims based on actions undertaken by Walmart of which Walmart provided notice of all material facts.

EIGHTY-SEVENTH DEFENSE

Walmart is entitled to, and claims the benefit of, all defenses and presumptions set forth in or arising from any rule of law or statute of any State whose substantive law might control the action.

EIGHTY-EIGHTH DEFENSE

Walmart asserts all applicable defenses under Federal Rule of Civil Procedure 8(c) and 12(b) and/or Okla. Stat. tit. 12 § 2012, as investigation and discovery proceeds.

EIGHTY-NINTH DEFENSE

To the extent they are not otherwise incorporated herein, Walmart incorporates as a defense the defenses and arguments raised in the motions to dismiss of the Manufacturer Defendants, Distributor Defendants, and Pharmacy Defendants in this case.

NINETIETH DEFENSE

Walmart adopts by reference any additional applicable defense pled by any other defendants not otherwise pled herein.

JURY DEMAND

Walmart hereby requests a jury trial as to all issues or claims triable in this action.

PRAYER FOR RELIEF

WHEREFORE, Walmart prays for relief from judgment from Plaintiff as follows:

1. Plaintiff takes nothing by reason of this Complaint;
2. Walmart recovers its costs and attorneys' fees incurred herein; and
3. For such further and other relief as the Court deems proper.

Dated: July 26, 2019

Respectfully submitted,

/s/ Tara Fumerton

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Attorneys for Defendant Walmart Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 26, 2019, the foregoing was filed using the Court's CM/ECF filing system and will be served via the Court's CM/ECF filing system on all attorneys of record.

/s/ Tara Fumerton
Tara Fumerton